

# EXHIBIT 32

KILBURN TAMARA  
5/13/2021

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al.,	)	
Plaintiffs,	)	
vs.	)	No. 20-cv-00983-TSZ
CITY OF SEATTLE,	)	
Defendant.	)	

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ZOOM VIDEO DEPOSITION UPON ORAL EXAMINATION  
OF  
TAMARA KILBURN  
SWAY AND CAKE 30(b)(6)

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9:00 a.m.  
May 7, 2021

\*\*\* Contains Confidential Testimony and Exhibits \*\*\*

REPORTED BY: Pat Lessard, CCR #2104

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1 Q. And what was that email?

# Redacted - Confidential

7 Q. Okay.

8 A. I don't believe -- I'm not sure but I  
9 believe the building is owned by an investment group.  
10 So it was more just -- I just wanted to know that I  
11 could keep moving forward and knowing that that was  
12 off the table for now.

13 Q. And when, about, do you think that last  
14 email was?

15 A. I'm sorry, I don't know.

16 Q. Was it around April, May?

17 A. I would -- I think it was later.

18 Q. Okay. Do you have a sense of whether it was  
19 June, July?

20 A. You know, I don't. I was -- I don't, sorry.

21 Q. And you think you don't have the earlier  
22 emails, is that right?

23 A. Yeah.

24 Q. And why not?

25 A. I don't really -- I don't know. I don't

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1 have them. I never -- I don't know whether I didn't  
2 save them or -- it wasn't a matter of -- [Redacted - Confidential]

3 [Redacted]  
4 [Redacted]  
5 [Redacted]

6 Q. What email system do you use?

7 A. I use Mail. The Mail option in my Apple  
8 account.

9 Q. And does that connect to a different email  
10 service?

11 A. I believe it connects to a host I used  
12 called Monster Development.

13 Q. And so did you just delete those emails out  
14 of your Mail app?

15 A. I'm assuming so.

16 MR. WEAVER: Objection. Go ahead and  
17 answer.

18 A. I'm assuming so.

19 Q. (By Ms. Pratt) Did I understand correctly,  
20 though, that you are sure that those emails don't  
21 exist anymore?

22 A. Yes.

23 Q. Okay. And all of the emails were with  
24 Ms. Augustine?

25 A. Yes.

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C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF KING )

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of TAMARA KILBURN was taken stenographically by me on May 7, 2021, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome.

I further certify that in accordance with CR 30(e) the witness was given the opportunity to examine, read and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th Day day of May, 2021.

*Pat Lessard*  
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